

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, *et al.*,

Defendants.

Adv. Pro. No. 09-01364 (SMB)

STIPULATION EXTENDING THE FACT DISCOVERY CUT-OFF DATE

Plaintiff Irving H. Picard (the “Trustee”), as trustee of the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa *et seq.* and Alpha Prime Fund Ltd. (the “Parties”), by and through their respective undersigned counsel, state as follows:

WHEREAS, pursuant to the Discovery Arbitrator’s Amended Fifth Discovery Order [ECF No. 629], the Fact Discovery Cut-Off Date is December 7, 2020;

WHEREAS, after having met and conferred concerning the Trustee's request for an extension to the Fact Discovery Cut-Off Date, the Parties agree and stipulate and the Discovery Arbitrator hereby orders:

1. The Fact Discovery Cut-Off Date is extended to December 7, 2021.
2. The Discovery Arbitrator's Amended Fifth Discovery Order [ECF No. 629]

otherwise remains in full force and effect.

Dated: December __, 2020
New York, New York

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

Oren J. Warshavsky
Email: owarshavsky@bakerlaw.com
Geoffrey A. North
Email: gnorth@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

SO ORDERED

Dated: December 1, 2020
New York, New York

DUFFYAMEDEO LLP

275 Seventh Ave, 7th Floor
New York, New York 10001
Telephone: (212) 729-5832
Facsimile: (212) 208-2437

Todd E. Duffy
Email: tduffy@duffyamedeo.com
Douglas Amedeo
Email: damedeo@duffyamedeo.com

Attorneys for Alpha Prime Fund Ltd.



Frank Maas
Discovery Arbitrator